

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Eastern (Richmond) Division

In Re: Debera Ann Walker

Case No. 16-30408-KRH
Chapter 13

**NOTICE OF OBJECTION TO DEBTOR'S CHAPTER 13 PLAN AND HEARING
THEREON**

2010 Subaru Forester (VIN# JF2SH6DC6AH783354),

JPMorgan Chase Bank, N.A. herein, has filed papers with the court objecting to debtor's chapter 13 plan. Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

The hearing is scheduled for **June 15, 2016 at 11:10 a.m.** at Judge Kevin R. Huennekens, in Court Room 5000, 701 East Broad St., Richmond, Virginia 23219

DATE: June 10, 2016

/s/ Jonathan Stapor, Esq. [js]

Attorney for JPMorgan Chase Bank, N.A.
312 Marshall Avenue, Ste. 800
Laurel, MD 20707
301-490-1196
Bar No. 88557

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed, first class, postage prepaid, on June 10, 2016, to Debera Ann Walker at 1653 W. Clara Dr., Petersburg, Virginia 23803. Copies were sent electronically via the CM/ECF system to Richard James Oulton, Attorney for Debtor and Carl M. Bates; Susan Hope Call, Trustee.

/s/ Jonathan Stapor, Esq.

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
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OBJECTION BY SECURED CREDITOR TO PROPOSED PLAN

Comes now the secured creditor, JPMorgan Chase Bank, N.A., which holds a Deed of Trust secured by the Debtor's real property at 2010 Subaru Forester (VIN# JF2SH6DC6AH783354) by and through its attorney, Jonathan Stapor, Esq., and objects to the proposed plan and to confirmation and for reason therefore states as follows:

1. The Debtor has proposed a plan which includes no provision for payment of arrearages owed to JPMorgan Chase Bank, N.A..
2. The pre-petition arrears owed to JPMorgan Chase Bank, N.A. as stated in the Proof of Claim filed herein, are \$1,308.16.
3. The plan as proposed by the Debtor would therefore be insufficient to pay the claim of JPMorgan Chase Bank, N.A..

Wherefore the Secured Creditor prays this court to enter an Order

1. Denying confirmation of the proposed Chapter 13 Plan, or alternatively
2. Modifying the Chapter 13 Plan to provide for payment in full of the Claim filed by the secured creditor, or alternatively
3. For such other and further relief as the Court deems appropriate.

Respectfully submitted:

/s/ Jonathan Stapor, Esq.

Attorney for JPMorgan Chase Bank, N.A.

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Laurel, MD 20707

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Bar No. 88557

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/s/ Jonathan Stapor, Esq.